Case 1:06-cv-06465-WHP

Document 7

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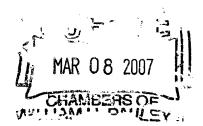
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March 8, 2007

Hon. William H. Pauley United States District Judge Daniel Patrick Moynihan United States District Court House New York, NY 10007

Ref: NJ Domains LLC v. Ville de Paris 06 CV 6465 (WHP)

Dear Judge Pauley:

I am corresponding counsel in the United States of a French law firm, Nataf Fajgenbaum & Associés, located in Paris, France which represents the City of Paris ("Ville de Paris").

Several months ago I was contacted by the Nataf firm in connection with the captioned matter and was asked to contact Plaintiff's counsel. Such contact was made, in December 2006 with Michael Freeman, Esq. Plaintiff's counsel and he forwarded to me a copy of the Complaint on December 11, 2006 and in his letter stated that at that time his process server was unable to confirm that service of process on Ville de Paris had been completed. I was also informed by Mr. Freeman that your Honor had signed an ORDER FOR PRETRIAL CONFERENCE setting down the date of February 2, 2007 for such Conference.

As the February date approached Mr. Freeman still had not received any confirmation of service and he wrote to you on January 23, 2007 to request an adjournment. Such request was granted and the adjourned date was set down for March 9, 2007. As of yesterday I have been informed that the Conference has now been set down for Monday, March 12 at 11:00 AM.

KEVIN MACCARTHY ASSOCIATES, P.C.

A little over a week ago I received an Email communication from Mr. Freeman informing me that he had finally received confirmation that the Ville de Paris had been served pursuant to the Hague Convention.

From the outset Mr. Freeman was informed that if this matter were to move forward that I would be called on by the Ville de Paris to contact Litigation Counsel to handle this case before the Court.

Based on the very recent confirmation of service I am now working together with Paris counsel to retain the selected litigation counsel in this matter. Such selection should be in place shortly and I will then meet with them to review the present status of this file in detail.

I was hoping to be able to explain the above to you personally at the Conference initially scheduled for tomorrow however, now that the date has been rescheduled for this coming Monday. I have a conflict since I will be leaving for South America on Sunday for a 10 day business trip.

Based on the above I am hereby requesting that the Court grant a second 4-week extension for the Conference. (The first request on behalf of the Ville de Paris). This will allow time for the Defendant to select and engage litigation counsel and for such counsel to fully familiarize himself with this file.

If you should require any additional information please do not hesitate to contact me.

Sincerely yours,

Kevin MacCarthy

CC: Michael Elkin, Esq. Winston & Strawn

Counsel for Plaintiff: Michael Freeman, Esq. (by Fax) Application granted in part. The conference is adjourned to 3/26/07 at 11:00 a.m.

SO ORDERED:

WILLIAM H. PAULEY III U.S.D.

3/13/07

## KEVIN MACCARTHY ASSOCIATES, P.C.

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## **Telecopy Transmittal Letter**

Client Matter

: La Ville de Paris

Date of Transmittal

3/8/07

## Please deliver the accompanying telecopy material to:

Firm/Company

United States Courthouse

Name

Hon. William H. Pawley

Telephone Number

(212) 805-6393

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